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VERIZON-MASSACHUSETTS) D. T. E. 98-57, PHASE III
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RESPONSE OF RHYTHMS LINKS, INC.
TO RECORD REQUEST

BA-MA RR-3 to Rhythms (BA to RLI)
Describe the process for provisioning xDSL services over a line shared loop once Rhythms places an order with Verizon until the service is provisioned to the end user?

PROPRIETARY RESPONSE [REDACTED]:

Rhythms objects that the marginal relevance of the information requested is outweighed by its highly confidential nature. As Rhythms will explain in its briefs, the experiences of one or two CLECs attempting to implement line sharing during a time when BA-MA had no obligation to accomplish provisioning in a reasonable interval that is responsive to expected demand are an insufficient basis for establishing intervals that will apply to all CLECs once the roll-out of line sharing is in full swing. In the spirit of the proceeding, however, and without waiving its objections, Rhythms provides the following response to this Request:

Methods and procedures for Rhythms' dealings with Rhythms' ISPs and other partners in the line sharing provisioning process are still under development. Because line sharing became available only recently, Rhythms has attempted to identify best practices for putting end users in service on line-shared facilities, and, most importantly, to improve significantly on the intervals that Rhythms experienced when provisioning stand-alone DSL loops to its partners. The market for broadband services dictates that the shortest possible provisioning intervals must prevail. BA's failure to provide line-sharing loops to Rhythms in the shortest possible amount of time will result in lost customers. The first and most critical component is to have BA deliver the line-shared loop on a one (1) business day provisioning interval. (The total BA interval encompasses not only the provisioning interval at issue here, but also any added time for BA tasks not included in that provisioning interval.)

Untitled

Under current practices for providing a line-shared loop to a Rhythms partner, a due date is set for BA's provisioning effort based on a six business day provisioning interval. On or after that due date, provided BA has actually completed the order on time and has so notified Rhythms, Rhythms tests the line to verify that the line is complete. If the test is not successful, Rhythms contacts BA to resolve any discrepancy.

Once Rhythms determines that BA's provisioning is complete, Rhythms arranges for the shipment of the necessary customer premises equipment ("CPE"), self installation instructions, and operating guide to the end user. Delivery of CPE must await the complete BA provisioning of the line shared line to avoid customer confusion that might result from all necessary hardware and software arriving at the end-user premises before the end-user can use the DSL service because the line itself is not yet ready. Rhythms does not have records of its partners' actual intervals for turning up their portion of the service after Rhythms and the BA have completed their provisioning.